

memorandum

DATE: OCT 08 1992

REPLY TO
ATTN OF: WMED:JPS:11799SUBJECT: Colorado Department of Health and U. S. Environmental Protection Agency Inspection
of the Rocky Flats Plant Plant Utilization and Disposal YardTO: D. Ferrera, Assistant General Manager, Maintenance and Plant Support, EG&G
J. Kersh, Associate General Manager, Environmental Restoration and Waste
Management, EG&G

On October 1, 1992, regulators from both the Colorado Department of Health (CDH) and the U. S. Environmental Protection Agency (EPA) performed an inspection of Individual Hazardous Substance Sites (IHSS) 170, 174, 176, and 210 (these IHSSs are all included in Operational Unit (OU) 10). The stated intent of this inspection was to investigate suspicions that known regulated wastes were being stored in these non-permitted areas. Attached is a copy of the CDH Notice of Inspection (NOI) (this NOI was faxed to Gene Ideker on October 1, 1992).

Although the CDH concerns noted on the NOI are neither voluminous nor directly citing a regulatory violation, individual discussions with the regulators indicated they were very concerned with the obvious neglect some areas have experienced. Of particular interest was how long it has taken EG&G to initiate actions to correct deficiencies at the Property Utilization and Disposal (PU&D) yard. At least 64 containers of waste are stored at the PU&D pending Resource Conservation and Recovery Act (RCRA) determination. Most of the containers are unlabeled, many are in extremely poor condition (several threatening imminent release), and others are marked in such a way to clearly suspect they are RCRA regulated wastes. These conditions at the PU&D yard suggest that the Rocky Flats Plant (RFP) is currently improperly handling and storing waste.

This inspection and the action plan schedules provided to the Rocky Flats Office (RFO) in response to the February 26, 1992, surveillance are clear indicators to RFO that EG&G is being non-responsive to correcting the problems being experienced at the PU&D yard. RFO cited nearly identical issues as CDH during that surveillance. As RFO stated in the related surveillance report (DOE memorandum WMED:FWG:3682) the findings were almost identical to those cited during an EG&G Waste Surveillance inspection of June 11, 1991. In summary, EG&G has been aware of the problems in this area for at least 15 months, and still the fundamental issues of potential non-compliance persist.

To correct these deficiencies EG&G must act immediately. EG&G must, 1) repackaging or overpack all containers in the PU&D that are at risk of imminent release, 2) place all containers where process knowledge or their markings suggest they are RCRA regulated in appropriate packaging and storage, 3) provide appropriate labeling for all containers, 4) complete immediate analysis of all containers to characterize this waste stream, and 5) immediately institute required inspections. RFO requests that these tasks be completed no later than October 12, 1992.

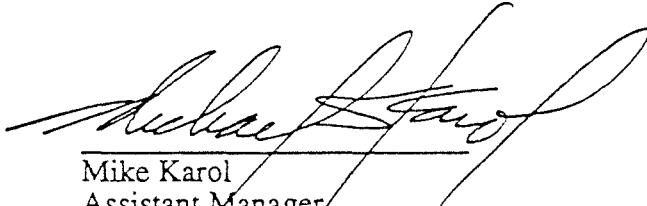
DOCUMENT CLASSIFICATION
REVIEW NUMBER PER
CLASSIFICATION OFFICE

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J. M. Kersh
WMED:JPS:11799

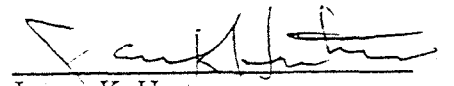
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To respond to the CDH NOI, EG&G must provide RFO documentation suitable for transmittal to CDH summarizing the actions being taken and the anticipated schedule to eliminate the unknown wastes in the PU&D yard. This data should be provided to RFO by October 12, 1992. Also, a document certifying completion should be provided to RFO within 5 working days of completion.

If you have any questions, please contact Bill Rask at extension 2648 or Tom Lukow at extension 4561.



Mike Karol
Assistant Manager
for Operations



James K. Hartman
Assistant Manager
for Environmental Management

Attachment

cc w/Attachment:
J. Wienand WOB, RFO
T. Lukow, WOB, RFO
J. Schneider, WOB, RFO
W. Bennett, SSB, RFO
A. Schubert, EG&G
J. Thompson, EG&G
J. Barnett, EG&G

Notice of Inspection

Facility Name Rocky Flats		OU 10 : IHSS's 170, 174, 176, 20	EPA I.D. # C0789 0010526	Date 10-1-92
Street 16 mi W. of Denver		P.O. Box 464	Telephone # 966-6308	Seq. #
City Golden	County Jefferson	Zip 80402	Inspection Arranged Prior to Inspection (<input checked="" type="checkbox"/>) Yes () No	Hour In: 10:00 AM
Facility Representatives and Titles John Ross - Waste Surveillance			Enter By: (<input checked="" type="checkbox"/>) Consent () Warrent	Hour Out: 3:55 PM
			Agency: (<input checked="" type="checkbox"/>) State () EPA () Oversight () Joint	

ACTIVITY TYPE(S): If Status Changed, Request Notification Revision	COMMENTS:
Generator ()	RFP needs to make timely hazardous waste determinations on product chemicals no longer intended for use especially in PD and D area.
Small Quantity Generator ()	
Cond. Exempt Generator ()	
Transporter ()	
Non-Land Disposal TSDF (<input checked="" type="checkbox"/>)	these materials, as potential hazardous wastes, need to be kept in containers in good condition and properly labeled.
Land Disposal TSDF ()	RFP needs to provide results of hazardous waste determinations to CDH
*Non-Notifier ()	
Other _____ ()	

samples, Documents, Plans, and / or Photos Collected	5.
	6.
	7.
	8.
	9.

samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

John F. Ross
Signature of Facility Representative

Lead Inspector: *Mark Nierniger* - 692-3351-CDH
 Assisting Inspector(s):
Caren Johannes - 692-3347-CDH
David Maxwell - EPA 294-1082
Arturo Duran - EPA